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VIA ECF

The Honorable Robert M. Levy
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Airwair International Ltd. v. Primark US Corporation, Primark Limited*, Case No. 19-cv-06189 LDH-RML

Dear Judge Levy:

Defendants submit this letter to briefly respond to Plaintiff's motion (Dkt. No. 37) filed on March 3, 2021 requesting leave to amend the Complaint to add two allegedly infringing shoe models. While Defendants contest the merits of Plaintiff's late-filed amendments and believe they will prove futile, Defendants do not oppose Plaintiff's motion to amend its Complaint.

Dated: March 12, 2021

WINSTON & STRAWN LLP

By: /s/ Jennifer A. Golinveaux
Jennifer A. Golinveaux

Attorneys for Defendants
PRIMARK US CORPORATION
PRIMARK LIMITED